

DECISION MEMORANDUM

**TO: COMMISSIONER KJELLANDER
COMMISSIONER REDFORD
COMMISSIONER SMITH
COMMISSION SECRETARY
COMMISSION STAFF**

**FROM: KRISTINE SASSER
DEPUTY ATTORNEY GENERAL**

DATE: APRIL 8, 2011

**SUBJECT: PETITION OF AVISTA TO PERMANENTLY AMEND ITS IRP FILING
DATE, CASE NO. AVU-G-11-02**

On March 24, 2011, Avista filed a Petition with the Commission requesting authority to permanently change the filing of its natural gas Integrated Resource Plans (IRP) from December 31 of each odd-numbered year to August 31 of each even-numbered year. Reference Order No. 25342, GNR-G-93-02.

Avista states that three areas of significant workflow currently overlap and occur in the fall of each year: PGA filings, Avista's procurement planning and IRP drafting/review/finalizing. These processes place considerable demand on Avista and its stakeholders. Avista maintains that the IRP filing, in theory, does not have to be performed at the same time as the PGA filings and procurement planning. Accordingly, Avista is requesting a permanent shift of IRP dates. Avista contends that this shift has the support of Staff and other stakeholders who participate in the IRP process.

Avista states that it has discussed the shift in natural gas IRP filing dates with regulatory staff in Idaho, Washington and Oregon, all of whom support the proposal and have agreed that this would allow for a more thorough and efficient review of the natural gas IRP, given conflicting priorities. Avista maintains that, ultimately, the quality and thoroughness of the review process will be enhanced. In addition, the Company agrees to provide a natural gas demand update to the Commission between the time this request is approved and when the Company would otherwise make its August 2012 natural gas IRP filing, in order to allay any concerns about a delay in the filing of the 2012 IRP.

Avista notes that its electric IRP is due on August 31 of each odd-numbered year. A shift in the natural gas IRP filing date would provide a staggered filing for the Company's two IRP's and avoid any overlap in participation in the two separate plans by the stakeholder groups.

STAFF RECOMMENDATION

Staff recommends the Commission grant Avista's request to modify its natural gas IRP filing from December 31 in odd-numbered years to August 31 in even-numbered years without further procedure.

COMMISSION DECISION

Does the Commission wish to grant Avista's request to permanently modify the filing of the Company's natural gas IRP from December 31 in odd-numbered years to August 31 in even-numbered years beginning with the December 2011 filing without further procedure?



Kristine A. Sasser
Deputy Attorney General

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